

EXHIBIT D

In the Matter Of:

WOLKING and DARYL WOLKING vs

HENRY LINDNER

HENRY LINDNER, M.D.

February 21, 2024



1 know, an electronic or e-mail prescription.

2 Q. Did you know Brian Bryk as well?
3 Spelled B-R-Y-K?

4 A. Yes. He came along within a few
5 months of her taking over the pharmacy. So, he
6 was the additional pharmacist working there.

7 Q. Did you also communicate with
8 Brian or was it all through Courtney?

9 A. Both of them. The e-mail
10 actually says "Courtney," so I never knew
11 whether it was Brian or Courtney. And I didn't
12 know who would be up there whenever I went up
13 to get prescriptions or to buy some supplements
14 or something.

15 Q. Okay. Did you -- do you know if
16 you ever exchanged e-mails, with that Courtney
17 e-mail address, about Stacey Wolking?

18 A. I believe I -- the only thing I
19 did was send prescriptions to her by e-mail.

20 Q. Did you ever send any e-mails to
21 that e-mail address about the more general
22 issue of corticosteroid prescriptions for your
23 babesiosis patients?

24 A. No. No. I did discuss that

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1 with them in person, because remember, I said I
2 got all my daughter's prescriptions there. And
3 she was very sick, and so I would explain to
4 them what was wrong with my daughter and what
5 I'm doing to try to help her. So, they came to
6 understand my approach to the treatment of this
7 disease for those who were requiring
8 corticosteroids.

9 Q. And do you know when that
10 in-person conversation took place about your
11 daughter?

12 A. Probably several times over the
13 years, from soon after she -- I started to
14 treat her -- well, soon after -- probably soon
15 after she started needing high dose steroids,
16 which began after a neurologist gave my
17 daughter 1,000 milligrams of methylprednisone a
18 day for 5 days to treat what he thought would
19 be autoimmune encephalitis. And it was after
20 that my daughter got much, much worse when
21 withdrawal from the high steroid regiment --
22 and she started to need prednisone doses that
23 eventually got up to, like, 400 a day before I
24 took over her treatment. So, even in that --

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1 that was in October 2020, so I must have gotten
2 those steroids from
3 Tunkhannock Compounding Center also.

4 Q. Okay. So, are you saying that
5 you think you spoke to Courtney Young about
6 this issue with your daughter on steroids
7 before October 2020?

8 A. No. Around October -- in
9 October 2020, I would say.

10 Q. Do you remember where that
11 conversation took place?

12 A. It would have been in the
13 Tunkhannock Compounding Center. She never had
14 any reason to come to my office, which is
15 downstairs.

16 Q. Do you remember if anyone else
17 was part of that conversation, besides you and
18 her?

19 A. It's a small compounding center.
20 So, you know, people working there would
21 overhear what I would discuss with Courtney.
22 We were never in an isolated area.

23 Q. And what did you discuss with
24 her in that conversation?

1 A. In multiple conversations, I
2 would discuss what's going on with my daughter
3 and how sick she is, why she needed large
4 amounts of steroids, how we were unable to
5 reduce her steroid dose, but -- how I was
6 treating her with antibabesials. You know, I
7 discussed my daughter's case with her.

8 Q. Did you ever tell Courtney Young
9 specifically what doses of prednisone
10 equivalent your daughter was taking in a day?

11 A. Yes. I'm sure I did.

12 Q. And did that include times that
13 your daughter was taking, let's say, over
14 1,000 milligrams a day? Did you tell
15 Courtney Young about that?

16 A. I'm sure I did, because I had to
17 go and get, you know, very large amounts from
18 her. And so, I would explain to her what was
19 going on with my daughter at the time. And she
20 understood too how -- as I explained to her, I
21 could get her corticosteroid down -- dose down
22 by giving her strong tafenoquine and artesunate
23 doses on top of the other two antibabesials.

24 Q. Did you ever give --

1 A. I --

2 Q. Sorry. Go ahead and finish.

3 A. I mean, it was shocking to me
4 that -- I never imagined I would see such a
5 thing. And so, I was quite happy to talk to
6 her -- talk to her about it and tell her, you
7 know, what was going on why and I was needing
8 to get these large amounts.

9 Q. Did you ever give Courtney Young
10 any of the documents or PowerPoint
11 presentations that you authored about this --
12 about babesiosis and its treatment?

13 A. No. I don't believe so.

14 Q. Did you ever share any reference
15 materials or documents with her, at all, about
16 babesiosis?

17 A. I don't believe so. You would
18 have to ask her. I -- but I don't think I did.
19 I don't -- she ever asked for it. I think just
20 listened and that was it.

21 Q. Okay. I'm going to pull up your
22 discovery responses again. This is Exhibit-20.
23 And I'm going to look at answer number 20. You
24 wrote, "The pharmacists of the

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1 Tunkhannock Compounding Center have routinely
2 questioned" your "prescriptions for hormone
3 products when they were implausible or
4 incomplete." So, I have a couple questions
5 about that.

6 One is, when the term hormone
7 products -- is that specific to your
8 hormone restoration practice or would it
9 include the corticosteroids for babesiosis
10 patients?

11 A. Yeah. Primary there I was
12 talking about the hormone products, which, you
13 know, were questioned if the dose was weird. I
14 think they did ask me at least on one occasion
15 when I, you know, requested they send, say 400
16 tablets of dexamethasone to Stacey or to
17 another patient. I think they did ask, you
18 know, what is the -- maybe it was Brian in
19 particular asked what's the prescription? You
20 know, how many do you want to them to take at
21 any time? But of course, what I had explained
22 to Courtney -- and I never -- I talked to the
23 situation with Brian but not as much as
24 Courtney. But what, you know, the fact is I

1 had no idea how much of the steroid the person
2 would need or how quickly. I just wanted to
3 make sure they got a large amount on hand that
4 they could use if they started to need very
5 high doses temporarily.

6 Q. Okay. I guess, what I'm asking
7 you is a little simpler.

8 It's just -- did the pharmacists
9 question your prescriptions for corticosteroids
10 for a babesiosis patient? Did they question
11 them?

12 A. No. Just -- they asked -- one
13 of them asked me at one point, you know, to
14 give a, you know -- a prescription in terms of
15 how many tablets to take for how long or
16 whatever. So, I gave them something that they
17 could use.

18 And I, you know, the same has
19 happened when I -- I have got some large doses
20 of corticosteroids for my daughter from a local
21 pharmacy called Weiss Markets. And -- I -- you
22 know, they also ask you do you have a, you know
23 -- what's the way of taking it. So, I would
24 just essentially make up something, because

1 there was -- it was basically patient-guided
2 and, you know, physician-patient decision as to
3 what dose was being taken at -- on any given
4 day.

5 Q. Okay. We'll come back to that.
6 But just to stay on this for a second, the --
7 when you say there were -- they questioned a
8 prescription when it was implausible or
9 incomplete, what did you mean by implausible or
10 incomplete?

11 A. Ah, that would only apply to the
12 hormone products. You know, say, if I didn't
13 specify, you know, the concentration or --
14 implausible meant -- well, Carol Daniels used
15 to question me if I prescribed estradiol
16 without progesterone. She would say, "What's
17 going on? People need progesterone too if they
18 are taking estradiol." But, you know, one
19 occasionally makes mistakes with writing out a
20 prescription, and they would question me if it
21 didn't make any sense.

22 Q. Okay. So, for Courtney Young
23 specifically, did she ever question you for a
24 corticosteroid prescription being implausible

1 or incomplete?

2 A. No. Unless she was one of them
3 that asked me at times for some kind of, you
4 know, instructions.

5 Q. But -- and I know you mentioned
6 Carol Daniels, but did Courtney Young ever
7 question for you for a hormone product
8 prescription being implausible or incomplete?

9 A. Oh, yes.

10 Q. And is that for the same reasons
11 you mentioned -- that maybe something was
12 written down wrong or there was a lack of an
13 accompanying drug --

14 A. Yes.

15 Q. -- to go with it or something?

16 A. Yes.

17 Q. Okay. I'm going to pull up
18 Exhibit-1 again. And we're going to be on
19 page 393. This is an e-mail -- it looks like
20 from -- and actually you have to go onto page
21 392 to see the date. It looks like an e-mail
22 from you to Stacey on August 15th of 2022.

23 And if you go down on 393, do
24 you see the part where it says, "I want to you

1 purchase" -- if you could just read that
2 paragraph and let me know when you have read
3 it?

4 A. Yes. I have read it.

5 Q. Okay. Had a pharmacy ever
6 complained to your medical board before? That
7 you know of?

8 A. No. Not -- no pharmacist
9 complained to my medical board. I have had
10 pharmacist -- I had one pharmacist, relatively
11 early before this, refuse to fill a
12 prescription for benzodiazepine for a patient.
13 We had a -- some back and forth. And I wrote a
14 letter.

15 But I've certainly heard of
16 stories where patients -- where doctors,
17 including one very prominent -- a Lyme-literate
18 doctor -- having pharmacists complain to a
19 medical board. And his license was restricted
20 as a result.

21 So, it definitely happens. And
22 it has been more common since COVID and the
23 kind of instructions that the pharmacists at
24 major chains have received to question doctors'

1 prescriptions.

2 Q. Okay. And is it fair to say
3 from this, that you did not believe the
4 Tunkhannock Compounding Center would question
5 this dexamethazone prescription?

6 A. Correct. Because they knew my
7 practice. They knew what I was doing.

8 Q. And is that -- that's because of
9 the conversations you had had with
10 Courtney Young up to this point?

11 A. Yes.

12 Q. Okay.

13 A. And probably Brian also.

14 Q. Did Courtney or Brian ever tell
15 you that they would not report you to your
16 medical board?

17 A. No.

18 Q. Okay. I'm going to pull up now
19 what I've marked as Exhibit-19.

20 Do you recognize what this is?

21 A. Well, I see it's
22 Tunkhannock Compounding Center and a number of
23 prescriptions.

24 Q. And I'm going to go to page 2.

1 MS. SCHWED: Can we just
2 establish whether he's ever seen it or
3 not, Conor?

4 MR. LAMB: Sure.

5 THE WITNESS: I've never seen
6 it. It --

7 BY MR. LAMB:

8 Q. That answer may be different
9 between page 1 and page 2, so I was going to
10 ask you that for page 2.

11 But page 1, have you ever seen
12 it?

13 A. No.

14 Q. Okay. Page 2 of Exhibit-19,
15 have you ever seen this?

16 A. No. It's apparently some, you
17 know, way that they write up prescriptions that
18 I have sent electronically. They are printed
19 out.

20 Q. Okay. So, is this the --
21 the pre- -- the same information for a
22 prescription that you wrote for Stacey Wolking?

23 A. I believe so, yes.

24 Q. Okay.

1 A. I have no reason to question it.

2 Q. Is what you're saying that --
3 that this is not the format in which you wrote
4 the prescription?

5 A. Oh, I believe it is. I think by
6 this time I was using electronic prescribing.
7 And I believe this is how their system prints
8 out an electronic prescription.

9 Q. Okay.

10 MS. SCHWED: When you say
11 "their," who do you mean?

12 THE WITNESS: Tunkhannock
13 Compounding Center.

14 BY MR. LAMB:

15 Q. Okay. So, did you write a
16 prescription on August 4, 2022, for
17 Stacey Wolking for 500 tablets of prednisone,
18 10 milligram oral tablet, as it says on page 2
19 of Exhibit-19?

20 A. I have no reason to doubt it.

21 Q. Okay. Let's take this
22 prescription. You have mentioned several
23 conversations that you had with Courtney Young
24 about your daughter's treatment and

1 corticosteroids and babesiosis.

2 Did you have any conversations
3 like that with Courtney Young about
4 Stacey Wolking specifically?

5 A. I don't believe so.

6 Q. On August 4, 2022, or before,
7 did you ever speak the Courtney Young about
8 Stacey Wolking at all?

9 A. You know, I cannot rule out
10 that -- that maybe the first time I sent the
11 prescription to Stacey, I may have contacted --
12 I may have spoken with her about the patient.
13 I don't remember.

14 Q. Okay. After you wrote this
15 prescription on August 4, 2022, did you speak
16 to Courtney Young about this specific
17 prescription?

18 A. Not that I recall.

19 Q. Did you speak to Brian Bryk
20 about this particular prescription from
21 August 4, 2022?

22 A. Not that I recall.

23 Q. Did anyone that worked at
24 Tunkhannock Compounding Center question you